

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

FLOYD MARSHALL, \*  
\*  
Plaintiff, \*  
\*  
vs. \* CV No. 3:07-CV-00056-WKW-SWR  
\*  
RANDALL KRAIG BOBO; And \*  
PRECISION MOVERS, INC.; \*  
\*  
Defendants. \*

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**Proposed Discovery Plan**

1. In accordance with Federal Rule of Civil Procedure 26(f), the parties have agreed to the following Proposed Discovery Plan. The agreement was reached by and between the following attorneys:

Dustin Brown for the Plaintiff Floyd Marshall;

Alex Holtsford for the Defendants Randall Kraig Bobo and Precision Movers, Inc.

2. **Pre-Discovery Disclosures:** The parties shall exchange the information required by Federal Rule of Civil Procedure 26(a)(1) within twenty (20) days of the Court's Scheduling Conference Order.

3. **Joinder of Parties and Amendments of Pleadings:** Plaintiff should be allowed until **June 1, 2007** to join additional parties and until **June 1, 2007** to amend the pleadings. Defendants should be allowed until **June 1, 2007** to join additional parties and until **June 1, 2007** to amend the pleadings.

4. **Discovery Plan:** Discovery will be needed on questions of liability,

defenses, injuries, damages and other requested remedies.

- a. Discovery shall be completed by **November 1, 2007**.
- b. Each party may propound a maximum of forty-five (45) interrogatories to any other party. Responses will be due thirty (30) days after service as required by Federal Rule of Civil Procedure 33.
- c. Each party may propound a maximum of forty-five (45) requests for production to any other party. Responses will be due thirty (30) days after service as required by Federal Rule of Civil Procedure 34.
- d. There will be a maximum of ten (10) depositions by Plaintiff and ten (10) depositions by Defendants.
- e. Reports and complete *curriculum vitae* from experts expected to be used at trial under Federal Rule of Civil Procedure 26(a)(2) will be due from the Plaintiff by **June 15, 2007**.
- f. Reports and complete *curriculum vitae* from expert expected to be used at trial under Federal Rule of Civil Procedure 26(a)(2) will be due from Defendants by **July 20, 2007**.
- g. Each party will make experts available for deposition no later than six (6) weeks from disclosure.
- h. Plaintiff's preliminary witness list is due **June 29, 2007**.
- i. Defendants' preliminary witness list is due **July 16, 2007**.

4. **Other Items**

- a. The parties do not request a conference with the Court before entry of the Scheduling/Discovery Order.

- b. All dispositive motions should be filed no later than sixty (60) days before the Pre-trial conference scheduled by the Court in this matter.
- c. Each party shall file their final lists of witnesses no later than ninety (90) days prior to the pre-trial conference. Each party may seek leave of this Court to depose any witness not previously identified by the opposing party.
- d. Each party's final lists of exhibits will be due six weeks prior to the trial date. Exhibits listed therein will be made available to the opposing counsel immediately upon request.
- e. Parties must file objections to the opposing party's final list of witnesses and/or exhibits within 14 days of service.

5. **Pre-trial conference:** The pre-trial conference in this matter shall be set thirty (30) days prior to the trial of this matter.

6. **Trial:** Trial of this matter is set for **March 24, 2008**. Trial of this matter is expected to take no more than three (3) days.

Respectfully, submitted this the 12<sup>th</sup> day of March, 2007.

/s/Alex Holtsford  
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ALEX L. HOLTSFORD, JR. (HOL048)  
Attorney For Defendant Precision Movers and  
Defendant Randall Kraig Bobo

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/s/Dustin T. Brown  
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